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REC'D TN  
REGULATORY AUTH.

Guy M. Hicks  
General Counsel

01 NOV 20 PM 3 10

OFFICE OF THE  
EXECUTIVE SECRETARY  
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November 20, 200

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Docket to Determine the Compliance of BellSouth  
Telecommunications, Inc.'s Operations Support Systems with State  
and Federal Regulations*  
Docket No. 01-00362

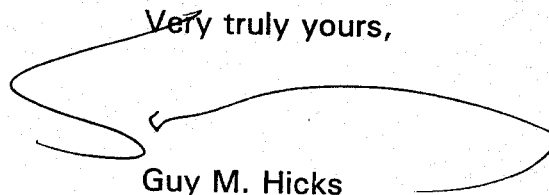
Dear Mr. Waddell:

Enclosed are fourteen copies of the pre-filed Rebuttal Testimony and Exhibits  
of the following witnesses:

Ken Ainsworth  
Alfred Heartley  
Ronald Pate  
David Scollard

Copies of the enclosed have been provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH/jej

Enclosure

## CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

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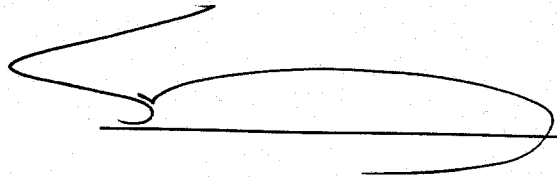
Charles B. Welch, Esquire  
Farris, Mathews, et al.  
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Competitive Telecom Assoc.  
1900 M St., NW, #800  
Washington, DC 20036

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Jack Robinson, Esquire  
Gullett, Sanford, Robinson & Martin  
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Nashville, TN 37219-8888

A handwritten signature in dark ink, appearing to read "Jack Robinson", written over a horizontal line.

1                   BEFORE THE TENNESSEE REGULATORY AUTHORITY  
2                   REBUTTAL TESTIMONY OF KEN L. AINSWORTH

3                   ON BEHALF OF

4                   BELLSOUTH TELECOMMUNICATIONS, INC.

5                   DOCKET NO. 01-00362

6                   NOVEMBER 20, 2001  
7

8    Q.    STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR  
9           POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.  
10          ("BELLSOUTH").  
11

12   A.    My name is Ken L. Ainsworth. My business address is 675 West Peachtree  
13           Street, Atlanta, Georgia 30375. My present title is Director – Interconnection  
14           Operations for BellSouth.  
15

16   Q.    HAVE YOU FILED TESTIMONY PREVIOUSLY IN THIS PROCEEDING?  
17

18   A.    Yes. I filed direct testimony on October 22, 2001.  
19

20   Q.    WHAT IS THE PURPOSE OF YOUR TESTIMONY TODAY?  
21

22   A.    The purpose of my rebuttal testimony is to respond to the testimony filed by  
23           Mr. Jay M. Bradbury on behalf of AT&T in response to BellSouth's October 22,  
24           2001 filing.  
25

1 Q. PLEASE COMMENT ON MR. BRADBURY'S ALLEGATION ON PAGE 15  
2 THAT BELL SOUTH'S MANUAL SYSTEMS THAT PERFORM ORDERING  
3 FUNCTIONS ARE NOT THE SAME THROUGHOUT BELL SOUTH'S NINE-  
4 STATE REGION.

5  
6 A. A center providing support for a CLEC seeking to provide service to customers in  
7 Tennessee is the very same center that provides support for a CLEC seeking to  
8 provide service to customers in any of the nine states within the BellSouth region.  
9 As stated in my direct testimony, since the Commission's Second Louisiana  
10 Order, BellSouth has reduced the number and types of orders that require manual  
11 handling. For those remaining orders for basic CLEC resale services and  
12 Unbundled Network Elements ("UNEs") that are either submitted manually or  
13 fallout by design, the LCSCs are responsible for the pre-ordering and ordering  
14 activities, and handle those orders on a region-wide basis.

15  
16 Additionally, methods and procedures utilized by these centers to provide  
17 regional support for CLECs are accessible through the Corporate Document and  
18 Interface Access ("CDIA") system that provides web-based access to the  
19 documents. All employees have access to the Web site to view or print any  
20 documents that they need to perform their functions in accordance with the  
21 regional processes supporting CLEC activities. See, e.g., Kansas/Oklahoma  
22 Order ¶ 111 (2001).

1 For CLEC ordering, BellSouth has implemented three centers that comprise its  
2 Local Carrier Service Centers ("LCSCs"). These centers, located in Birmingham,  
3 Atlanta, and Jacksonville, have the exact same commitments for providing Firm  
4 Order Confirmations ("FOCs") to the Competitive Local Exchange Carriers  
5 ("CLECs"), regardless of the state for which the order is submitted. The  
6 Jacksonville LCSC is a CLEC service center whose primary objective is  
7 responding to CLEC service order related calls. The Jacksonville LCSC also acts  
8 as an overflow service order issuance center to support Atlanta and Birmingham  
9 when load peaks are encountered. The LCSC's operational processes, systems  
10 and training are regional for the BellSouth nine state area. Therefore, these  
11 centers provide the same operational consistency throughout the BellSouth region.  
12 Each of the three centers has the same commitment to customer service.  
13 Performance is tracked internally for each separate center; however, the results  
14 are combined for the regional results. All of these service representatives in each  
15 work group (i.e., Resale, Complex, UNE) received the same service  
16 representative training, which is substantially the same as the training received by  
17 retail representatives.

18  
19 CLEC order volumes have increased over the last several months from 88,325  
20 LSRs received in January 2001 to 123,249 LSRs received in October 2001, yet  
21 the LCSC has continued to meet, and in many cases far exceed, the performance  
22 benchmarks set by the State Commissions. The FOC and reject duration  
23 summary is published on BellSouth's Monthly State Summary ("MSS") website  
24 and reports indicate that the LCSCs are currently meeting or exceeding the overall  
25 FOC and reject interval for Tennessee (see Exhibit KLA-1).

1 Thus, as stated above, the LCSC that provides manual processing for a CLEC  
2 seeking to provide service to customers in Tennessee is the very same LCSC that  
3 provides manual processing for a CLEC seeking to provide service to customers  
4 in any of the nine states within the BellSouth region. Once in the LCSC, LSRs  
5 are handled according to product type; they are not divided by state. Both  
6 mechanized fallout and manually submitted LSRs are handled on a first-in/first-  
7 out non-discriminatory basis.

8  
9 Q. IS THERE A MATERIAL DIFFERENCE IN MANUAL HANDLING WHEN  
10 USING SONGS OR DOE AS ALLEGED BY MR. BRADBURY?

11  
12 A. No. Mr. Bradbury (page 16) would have you believe that "it is impossible to  
13 ascertain whether the differences in these systems have any material impact on  
14 performance without complete data on its day-to-day commercial production  
15 experience." This simply is not the case. As stated in my direct testimony, DOE  
16 and SONGS are input software programs that are used to provide the BellSouth  
17 Service Order Control System ("SOCS") with data necessary to generate service  
18 order requests. There are no material differences in functionality between DOE  
19 and SONGS. Both systems use similar processes for creating a service order.  
20 This is because SOCS requires the same LSR screening and validating procedure.  
21 As discussed in the testimony of Mr. Milton McElroy, BellSouth engaged an  
22 independent third party, Price Waterhouse Coopers, to analyze the comparability  
23 between the DOE and SONGS systems and develop an appropriate testing  
24 approach to validate BellSouth's assertion that there is no material difference in  
25 functionality between DOE and SONGS. Once the LSR information is input into

1 DOE or SONGS it generates the same order in SOCS used to provide service to  
2 CLECs across all nine states in the BellSouth region. The LCSC Service  
3 Representative uses SONGS and DOE to perform due date calculations. The due  
4 date determination depends upon the standard service interval and installation  
5 personnel availability. For setting due dates where a premises visit is required,  
6 both DOE and SONGS allow the choice of an AM or PM appointment. These are  
7 the same options available to BellSouth retail customers.  
8

9 Q. DOES THAT CONCLUDE YOUR TESTIMONY?  
10

11 A. Yes.  
12  
13  
14  
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25



# FOC Timeliness and Reject Interval Tennessee

KLA-1

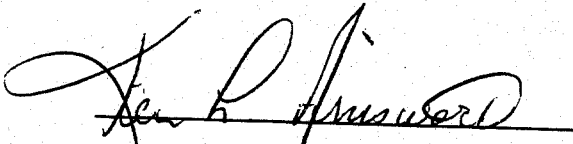
| FOC Timeliness ( <b>Partially Mechanized</b> ) by CLEC by State - Objective: 85% within 10 Hours |       |   |        |        |        |        |        |        |  |
|--|-------|---|--------|--------|--------|--------|--------|--------|--|
| CLEC   | State | METRICS                                 | Apr-01 | May-01 | Jun-01 | Jul-01 | Aug-01 | Sep-01 |  |
| CLEC   | TN    | Firm Orders Confirmed P/T Mech 0-10 Hrs | 2509   | 3240   | 3027   | 3235   | 4145   | 3406   |  |
|  |       | Firm Orders Confirmed                   | 2757   | 3557   | 3595   | 3784   | 4439   | 3660   |  |
|  |       | % FOC in 10 Hours                       | 91.0%  | 91.1%  | 84.2%  | 85.5%  | 93.4%  | 93.1%  |  |
| FOC Timeliness ( <b>Non-Mechanized</b> ) by CLEC by State - Objective: 85% within 36 Hours       |       |   |        |        |        |        |        |        |  |
| CLEC   | State | METRICS                                 | Apr-01 | May-01 | Jun-01 | Jul-01 | Aug-01 | Sep-01 |  |
| CLEC   | TN    | Firm Orders Confirmed NMech 0-36 Hrs    | 1748   | 881    | 887    | 1164   | 1817   | 1604   |  |
|  |       | Firm Orders Confirmed                   | 1762   | 884    | 890    | 1171   | 1825   | 1616   |  |
|  |       | % FOC in 36 Hours                       | 99.2%  | 99.7%  | 99.7%  | 99.4%  | 99.6%  | 99.3%  |  |
| Reject Interval ( <b>Partially Mechanized</b> ) by State - Objective: 85% within 10 Hours        |       |   |        |        |        |        |        |        |  |
| Aggregate  | State | METRICS                                 | Apr-01 | May-01 | Jun-01 | Jul-01 | Aug-01 | Sep-01 |  |
| CLEC   | TN    | Reject Count 0 - <=10 hrs               | 1416   | 2011   | 1374   | 1765   | 1910   | 1354   |  |
|  |       | Total Rejects                           | 1478   | 2115   | 1537   | 1916   | 1958   | 1390   |  |
|  |       | % Reject in 10 Hours                    | 95.8%  | 95.1%  | 89.4%  | 92.1%  | 97.5%  | 97.4%  |  |
| Reject Interval ( <b>Non-Mechanized</b> ) by State - Objective: 85% within 24 Hours              |       |   |        |        |        |        |        |        |  |
| Aggregate  | State | METRICS                                 | Apr-01 | May-01 | Jun-01 | Jul-01 | Aug-01 | Sep-01 |  |
| CLEC   | TN    | Service Requests Rejected Hours 0-24    | 580    | 387    | 454    | 607    | 761    | 788    |  |
|  |       | Total Rejects                           | 627    | 418    | 466    | 623    | 780    | 792    |  |
|  |       | % Reject in 24 Hours                    | 92.5%  | 92.6%  | 97.4%  | 97.4%  | 97.6%  | 99.5%  |  |

AFFIDAVIT

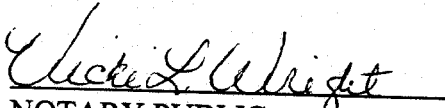
STATE OF: Georgia  
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ken L. Ainsworth -Director - Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 5 pages and 1 exhibit(s).

  
Ken L. Ainsworth

Sworn to and subscribed  
before me on November 20, 2001

  
NOTARY PUBLIC

Notary Public, Cobb County, Georgia  
My Commission Expires June 19, 2005

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**  
Nashville, Tennessee

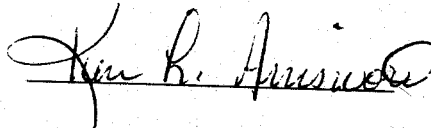
In re:

Docket to Determine the                     )  
Compliance of BellSouth                    )  
Telecommunications, Inc's.                   )  
Operations Support Systems with            )  
State and Federal Regulations             )

Docket No.: 01-00362

**AFFIDAVIT OF KEN L. AINSWORTH**

I, Ken L. Ainsworth, hereby certify that my testimony filed in this docket is current, Tennessee specific, or otherwise relevant to Tennessee. Any regional information provided is relevant to Tennessee. Any regional information is relevant to the extent it gives an indication of how the region is performing and, therefore, how performance in Tennessee should be viewed.



Ken L. Ainsworth

1                   BELLSOUTH TELECOMMUNICATIONS, INC.  
2                   REBUTTAL TESTIMONY OF ALFRED HEARTLEY  
3                   BEFORE THE TENNESSEE REGULATORY AUTHORITY

4                   DOCKET NO. 01-00362

5                   November 20, 2001  
6  
7

8    Q.     PLEASE STATE YOUR NAME FOR THE RECORD.  
9

10   A.    My name is Alfred Heartley. I am the same Alfred Heartley who previously filed direct  
11           testimony in this proceeding on October 22, 2001.  
12

13   Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?  
14

15   A.    The purpose of my testimony is to respond to incorrect statements that AT&T's witness  
16           Jay Bradbury has made about the regionality of BellSouth's OSS.  
17

18   Q.    WHAT HAS THE FCC SAID ABOUT THE REGIONALITY OF AN ILEC'S  
19           NETWORK OPERATIONS?  
20

21   A.    In its review of the Kansas/Oklahoma Application, the Department of Justice ("DOJ")  
22           said, and the FCC agreed, that the approach taken by Southwestern Bell in its reliance on  
23           the regionality of its OSS was a "sensible and efficient approach that can avoid the delay

1 and expense of redundant testing.” Department of Justice Evaluation at 28, Joint  
2 Application by SBC Communications Inc., Southwestern Bell Telephone Company, and  
3 Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance  
4 for Provision of In-Region, InterLATA Services in Kansas and Oklahoma, CC Docket No.  
5 00-217 (FCC filed Nov. 25, 2000); Kansas/Oklahoma Order ¶ 118. BellSouth urges the  
6 Tennessee Regulatory Authority (TRA) to employ the same kind of sensible and efficient  
7 approach. By contrast, Mr. Bradbury argues that the TRA should ignore directly relevant  
8 evidence from other states. That argument, however, rests on a series of unsubstantiated  
9 and incorrect allegations regarding the regionality of BellSouth’s network operations.  
10 The majority of those allegations were already addressed in my direct testimony. The  
11 other assertions are addressed below.

12  
13 Q. PLEASE ADDRESS MR. BRADBURY’S ARGUMENT THAT DIFFERENCES IN  
14 PERFORMANCE MUST INDICATE DIFFERENCES IN PROCESSES.

15  
16 A. Mr. Bradbury’s primary argument appears to be that BellSouth’s processes cannot be the  
17 same across its region unless they produce the same results. The fact that results may  
18 not be the same between states does not demonstrate that BellSouth’s OSS is not the  
19 same across its region. As I explained in my direct testimony, because of variables  
20 beyond a company’s control (including such things as weather, topology, local  
21 regulations governing such processes as excavation, and differences in order volumes),  
22 performance results will generally not be the same in any interstate comparison. The  
23 FCC has never suggested that such inevitable differences beyond a BOC’s control

1       undermine a sameness showing. To the contrary, in the Kansas/Oklahoma matter, SBC did  
2       not contend that its performance in those states was the same as that in Texas. Rather, it  
3       explained there, as I have here, that variations across Southwestern Bell's territory were  
4       due to "variables beyond SWBT's control," and the FCC found that regionality existed.  
5       See Reply Affidavit of Larry K. Mah ¶ 31, Joint Application by SBC Communications  
6       Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications  
7       Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region,  
8       InterLATA Services in Kansas and Oklahoma, CC Docket No. 00-217 (FCC filed Dec. 11,  
9       2000) ("KS/OK Mah Reply Aff."); see id. ¶¶ 31-37. The CLEC's attempt to impose an  
10      unattainable standard of same results should be rejected.

11  
12   Q.   WHAT IS THE RELEVANT QUESTION FOR THIS AUTHORITY TO ANSWER?

13  
14   A.   For all the reasons set forth above, contrary to Mr. Bradbury's contentions, the relevant  
15       question here is not whether the results across states are the same, but whether  
16       BellSouth's *processes* and *systems* are the same. The FCC has determined that, as to  
17       electronic OSS processes, a BOC may demonstrate "sameness" by showing that CLECs  
18       either use the identical system across different states or that CLECs use separate systems  
19       that "reasonably can be expected to behave the same way." Kansas/Oklahoma Order ¶  
20       111. As to manual processes, the FCC has emphasized evidence showing that those  
21       components operate pursuant to a common organizational structure, common methods  
22       and procedures, and common training. See id. ¶ 113.

1 Q. DESCRIBE THE REGIONALITY OF BELL SOUTH'S ELECTRONIC SYSTEMS  
2 USED FOR PROVISIONING, MAINTENANCE AND REPAIR.  
3

4 A. BellSouth has made precisely those showings in its direct testimony. As to electronic  
5 processes, my direct testimony demonstrates that, as to the legacy systems for  
6 provisioning, maintenance, and repair addressed there, BellSouth uses a "single version  
7 of each application, which handled CLEC and BellSouth service orders on a  
8 nondiscriminatory basis throughout the nine states" in BellSouth's region. While this  
9 single version of each legacy application is loaded onto two separate mainframes that are  
10 at different locations and serve different areas, those mainframes run the same software  
11 systems, and updates of both systems are made within days of each other. Mr. Pate and  
12 Mr. Ainsworth address the regionality of BellSouth's ordering and preordering processes.  
13

14 Q. DESCRIBE THE REGIONALITY OF BELL SOUTH'S MANUAL PROCESSES FOR  
15 PROVISIONING AND MAINTENANCE AND REPAIR.  
16

17 A. As to manual processes, my direct testimony demonstrates that BellSouth has a single  
18 management structure for those tasks, a centralized BellSouth Training organization that  
19 gives identical training to all BellSouth personnel (including the same tools and tests),  
20 and common methods and procedures that apply to all personnel across BellSouth's  
21 region, regardless of whether they are serving BellSouth retail customers or CLECs. They  
22 are thus the same across the region as defined by the FCC.  
23

1 Q. DOES THE FACT THAT BELLSOUTH'S WORK GROUPS FOR MANUAL  
2 PROCESSES ARE ORGANIZED ON A GEOGRAPHIC BASIS IMPACT A FINDING  
3 OF REGIONALITY?  
4

5 A. No. Mr. Bradbury argues that because the work groups for manual processes are  
6 organized on a geographic basis, BellSouth's sameness showing is somehow deficient.  
7 That claim is without merit. As I previously demonstrated, these work groups are all part  
8 of the same organizational structure, all report back to the same corporate officer, are  
9 managed under the same guidelines, and undergo the same training. Those facts are  
10 sufficient to show that BellSouth employees "would do their jobs in the same manner" in  
11 Tennessee as in Georgia, which is the relevant question here. See Kansas/Oklahoma  
12 Order ¶ 113. The fact that some work groups reside in various physical locations is based  
13 solely on the need to provide service to customers across BellSouth's region, not because  
14 they perform their jobs any differently.  
15

16 Q. IS THE NETWORK PORTION OF BELLSOUTH'S OSS THE SAME PURSUANT TO  
17 THE FCC'S DEFINITION?  
18

19 A. Absolutely. In short, the FCC has defined "same" to mean that "competing carriers in  
20 [multiple states] share the use of a single OSS": "a common set of processes, business  
21 rules, interfaces, systems, and in many instances, even personnel." Kansas/Oklahoma  
22 Order ¶ 111. With respect to provisioning and maintenance and repair, BellSouth must  
23 demonstrate "that its OSS reasonably can be expected to behave the same way" in



1 different states. As I have demonstrated, BellSouth's processes and procedures are  
2 designed for the network operations to behave in the same way. Mr. Bradbury's  
3 allegation that differences in performance equate to different OSS is unsupported by  
4 either the facts or FCC decisions.  
5

6 Q. DOES THIS CONCLUDE YOUR TESTIMONY?  
7

8 A. Yes, it does.  
9  
10

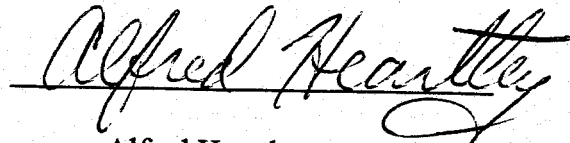
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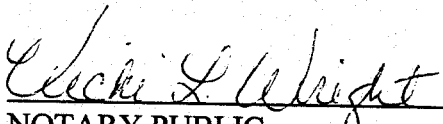
STATE OF: Georgia  
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Alfred Heartley –General Manager – Network Process Improvement, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 6 pages and 0 exhibit(s).

  
Alfred Heartley

Sworn to and subscribed  
before me on November 20, 2001

  
NOTARY PUBLIC

Notary Public, Cobb County, Georgia  
My Commission Expires June 19, 2005

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

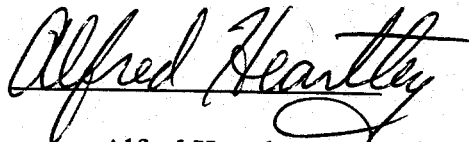
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Docket No.: 01-00362

**AFFIDAVIT OF ALFRED HEARTLEY**

I, Alfred Heartley, hereby certify that my testimony filed in this docket is current, Tennessee specific, or otherwise relevant to Tennessee. Any regional information provided is relevant to Tennessee. Any regional information is relevant to the extent it gives an indication of how the region is performing and, therefore, how performance in Tennessee should be viewed.

  
Alfred Heartley

1 TENNESSEE BELL SOUTH TELECOMMUNICATIONS, INC.

2 REBUTTAL TESTIMONY OF RONALD M. PATE

3 BEFORE THE TENNESSEE REGULATORY AUTHORITY

4 DOCKET NO. 01-00362

5 NOVEMBER 20, 2001

6  
7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELL SOUTH  
8 TELECOMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.

9  
10 A. My name is Ronald M. Pate. I am employed by BellSouth  
11 Telecommunications, Inc. ("BellSouth") as a Director, Interconnection  
12 Services. In this position, I handle certain issues related to local  
13 interconnection matters, primarily operations support systems ("OSS").  
14 My business address is 675 West Peachtree Street, Atlanta, Georgia  
15 30375.

16  
17 Q. ARE YOU THE SAME RONALD PATE WHO FILED DIRECT  
18 TESTIMONY IN THIS PROCEEDING?

19  
20 A. Yes.

21  
22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

23  
24 A. My testimony is to rebut the testimony of Mr. Bradbury with AT&T on the  
25 issue of whether BellSouth's electronic OSS are regional.

1 Q. ARE BELL SOUTH'S OSS REGIONAL IN NATURE?

2

3 A. Yes. On pages 8-18, Mr. Bradbury makes a number of claims about  
4 BellSouth's legacy systems (OSS) for pre-ordering, ordering, maintenance  
5 and repair, and billing and the supposed lack of regionality of these  
6 systems. BellSouth's OSS does not vary by OSS function, as claimed by  
7 Mr. Bradbury on page 8 of his testimony. I discussed the regionality of  
8 BellSouth's OSS and the regional functionality provided by the electronic  
9 interfaces for CLECs on pages 175-189 of my direct testimony of October  
10 22, 2001, and refiled on November 19, 2001. To reiterate, BellSouth  
11 provides Competitive Local Exchange Carriers ("CLECs") with one set of  
12 electronic and manual interfaces for all CLEC resale and UNE service  
13 requests throughout BellSouth's nine-state region – all of which provide  
14 nondiscriminatory access to BellSouth's OSS. Very simply put, a CLEC in  
15 Tennessee uses the same interfaces to access the same functionality of  
16 the same BellSouth OSS as a CLEC in any other state in BellSouth's  
17 region. Consequently, there are no "degree[s]" of functionality as Mr.  
18 Bradbury asserts on pages 9-10. There is only one TAG, RoboTAG™,  
19 EDI, LENS, TAFI, ECTA, ODUF, EODUF, and ADUF. These interfaces  
20 provide the same functionality throughout the BellSouth region.

21

22 Attached to my testimony filed October 22, 2001, and refiled on November  
23 19, 2001, is Exhibit OSS-69, entitled "Matrix Showing Regionality of  
24 Systems," which describes the electronic interfaces used by CLECs, the  
25 databases used exclusively by CLECs, the OSS shared by CLECs and

1 BellSouth, the function of each, the location of the server or servers, and  
2 the geographical responsibility of each of these applications. To the  
3 extent that there are separate servers for processing CLEC requests via  
4 these interfaces, the servers use the same programming code and are  
5 designed to operate in an indistinguishable manner. Similar to the  
6 situation with SWBT, the servers use the same type of hardware running  
7 identical software.<sup>1</sup> Therefore, the software, hardware, and the resulting  
8 functionality of BellSouth's OSS is regional in nature.  
9

10 Q. IS THERE ANY LOGICAL BASIS FOR MR. BRADBURY'S COMMENTS  
11 REGARDING THE FACT THAT BELL SOUTH'S DATA IS NOT  
12 CONTAINED IN A SINGLE DATABASE?  
13

14 A No. Mr. Bradbury's comments on pages 10-11 and 11-12 claiming that  
15 the mere fact that BellSouth's "different physical systems" prevent  
16 BellSouth's OSS from functioning in a regional manner are unsupported.  
17 There is no basis for Mr. Bradbury's inference that a database will perform  
18 more effectively or be more accurate simply because all of the data is in  
19 one location or contained in one server. Furthermore, Mr. Bradbury  
20 implies on page 10 that because the data in specific databases is  
21 "inherently geographic," it indicates a lack of regionality of BellSouth's  
22 OSS. Common sense demands that the data for each geographic

---

<sup>1</sup> "Where SWBT has discernibly separate OSS, SWBT demonstrates that its OSS reasonably can be expected to behave the same way in all three states. As described below, for example, the use by SWBT of two different order processing systems (a SORD processor in Dallas for retail and wholesale orders in Texas, and a SORD processor in St. Louis for retail and wholesale orders in SWBT's other four in-region states) use the same programming code and, moreover, are designed to operate in an indistinguishable manner." Kansas/Oklahoma Order, paragraph 111.

1 location match with the end user's data for that geographic location. The  
2 fact is that none of this geographically specific information, or the  
3 individual rules of the state commissions, diminishes the regionality of  
4 BellSouth's OSS.  
5  
6

7 Q. DOES BELL SOUTH PROVIDE DUE DATE CALCULATIONS ON A  
8 REGION-WIDE BASIS?  
9

10 A. Yes. On pages 11-12 of Mr. Bradbury's testimony, states that he is  
11 "unclear" as to "what legacy system supports due date calculations for  
12 Tennessee." DSAP supports Tennessee as to due date calculations just  
13 as it does for all other states within BellSouth's nine state region. This is  
14 clearly noted on Exhibit OSS-69 attached to my testimony filed October  
15 22, 2001, and refiled on November 19, 2001. As Mr. Bradbury should be  
16 aware, this same exhibit was filed as part of my testimony in 271  
17 proceedings before other state regulatory authorities. However, the  
18 information regarding the former South Central Bell states was mistakenly  
19 omitted for DSAP. That oversight was corrected in those proceedings by  
20 my errata sheet. With respect to this proceeding, Exhibit OSS-69 filed  
21 with my direct testimony is accurate, as it contains the referenced  
22 corrections.  
23

1 Q. DESCRIBE THE ELECTRONIC MAINTENANCE AND REPAIR  
2 INTERFACES BELL SOUTH MAKES AVAILABLE TO CLECS ON A  
3 REGION-WIDE BASIS.  
4

5 A. Mr. Bradbury comments about the functionality of the maintenance and  
6 repair functions on pages 17-18 of his testimony. BellSouth's  
7 maintenance and repair functions are also provided on a regional basis.  
8 For BellSouth's retail customers with basic local exchange service,  
9 BellSouth's business and residence repair center attendants use either a  
10 business or residence version of the human-to-machine Trouble Analysis  
11 Facilitation Interface ("TAFI"). BellSouth offers to CLECs a single TAFI  
12 system that combines the complete functionality of the separate business  
13 and residence versions of TAFI used by BellSouth's repair attendants.  
14 Accordingly, the CLEC-TAFI functionality is superior to BellSouth's TAFI  
15 since it can process both residence and business trouble reports on the  
16 same processor. Therefore, CLEC-TAFI provides better than  
17 nondiscriminatory access to BellSouth's maintenance OSS on a region-  
18 wide basis. Since it became available to CLECs in March 1997, 80  
19 CLECs have used TAFI to enter trouble reports. Region-wide, 31 CLECs  
20 used TAFI in 2000 to make 251,900 entries in TAFI. Through July 2001,  
21 33 CLECs have used TAFI to make 158,612 entries region-wide.  
22

23 BellSouth also offers CLECs the machine-to-machine Electronic  
24 Communications Trouble Administration ("ECTA") Gateway on a region-  
25 wide basis, which provides access to BellSouth's maintenance OSS



1 supporting both telephone-number and circuit-identified services (i.e.,  
2 designed and non-designed services). It supports both resold services  
3 and UNEs. To date, BellSouth has built five ECTA interfaces for CLECS.  
4 Two of those five are currently conducting various levels of testing, and  
5 one is actively using the ECTA interface. The other two still have the  
6 capability to access ECTA, but apparently have chosen not to do so for  
7 their own internal business reasons.  
8

9 Q. DO BELL SOUTH'S OSS FUNCTION ON A REGIONAL BASIS?  
10

11 A. Yes. As referenced above and further supported in my testimony filed  
12 October 22, 2001, and refiled on November 19, 2001, on page 185,  
13 BellSouth's OSS function on a regional basis. Transaction queries search  
14 and return the same information for end users in all nine states in  
15 BellSouth's region, regardless of the CLEC's location. For example,  
16 access to BellSouth's pre-order functionality providing access to Customer  
17 Service Records ("CSRs") is regional in nature. A competing carrier  
18 retrieving a CSR for an end user in Tennessee follows the same process  
19 in BellSouth's pre-ordering interface as a CLEC retrieving a CSR for an  
20 end user in any other state. Moreover, the result of any CSR request is  
21 presented in identical format and provides the correct geographic location,  
22 regardless of the state location of the end user.  
23

24 Q. IS BELL SOUTH'S ACCESS TO LOOP MAKEUP INFORMATION  
25 REGIONAL IN NATURE?

1

2 A. Yes. In other OSS proceedings in BellSouth's region, some CLECs have  
3 claimed that because the Corporate Facilities Database ("CFD") does not  
4 exist in every state, BellSouth's OSS are not regional in nature.

5

6 As I said in my direct testimony filed October 22, 2001, and refiled on  
7 November 19, 2001, on pages 103-104 and partially reiterated here, the  
8 source data for all loop makeup information is contained in the Loop  
9 Facilities Assignment and Control System ("LFACS") and LFACS is  
10 available region-wide. While 100% of BellSouth's loops are populated in  
11 LFACS with certain basic information, not all will have the detailed loop  
12 makeup information necessary to qualify a loop. Whenever a necessary  
13 component is missing from the loop makeup information residing in  
14 LFACS, BellSouth personnel use a combination of Engineering Work  
15 Orders, field visits, and the plats that contain records of BellSouth's  
16 Outside Plant Facilities to complete the loop makeup data that is stored in  
17 LFACS. Therefore, the process to obtain the data in LFACS is the same  
18 region-wide, while the method of storing foundational network data (e.g.  
19 cables, conduits, pole lines, etc.) within BellSouth differs somewhat within  
20 the region. In the states of Tennessee, Kentucky, Louisiana, Mississippi,  
21 and Alabama, the Outside Plant Facility data is recorded on manual or  
22 paper plats, whereas in other states, such as North Carolina, this data  
23 resides in the CFD, on a digitized version of the plats. Regardless of how  
24 the plat is maintained, when insufficient data resides in LFACS for a CLEC  
25 to qualify a loop, the CLEC may request a manual loop makeup service

1 inquiry. BellSouth obtains data from the plats and other records, and  
2 populates in LFACS the loop makeup information that has been generated  
3 as a result of that manual service inquiry. For BellSouth to serve its own  
4 customers, BellSouth must perform manual service inquiries for  
5 information when there is no electronic access for the requested  
6 information. Therefore, the service inquiry process for loop makeup  
7 information for CLECs is accomplished (whether manually or  
8 electronically) in substantially the same time and manner as for services  
9 offered to BellSouth's retail customers on a regional basis.  
10

11 Q. PLEASE SUMMARIZE YOUR TESTIMONY.  
12

13 A. In summary, BellSouth adopted the method SWBT used to provide the  
14 proof and gain the support and approval of state and federal commissions,  
15 as fully discussed on page 176 in my testimony filed October 22, 2001,  
16 and refiled on November 19, 2001, with this Authority. BellSouth's OSS  
17 are designed, developed, modified, and measured for performance on a  
18 region-wide basis to operate in an indistinguishable manner whether a  
19 CLEC is in Tennessee, Georgia or any of the other seven states in  
20 BellSouth's region.  
21

22 Q. DOES THIS CONCLUDE YOUR TESTIMONY?  
23


24 A. Yes.  
25

AFFIDAVIT

STATE OF: Georgia  
COUNTY OF: Fulton

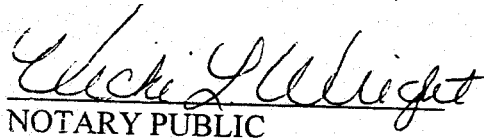
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ronald M. Pate –Director – Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 8 pages and 0 exhibit(s).



Ronald M. Pate

Sworn to and subscribed  
before me on November 20, 2001

  
NOTARY PUBLIC

Notary Public, Cobb County, Georgia  
My Commission Expires June 19, 2005

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**  
Nashville, Tennessee

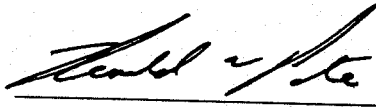
In re:

Docket to Determine the                     )  
Compliance of BellSouth                    )  
Telecommunications, Inc.'s.                   )  
Operations Support Systems with             )  
State and Federal Regulations               )

Docket No.: 01-00362

AFFIDAVIT OF RONALD M. PATE

I, Ronald M. Pate, hereby certify that my testimony filed in this docket is current, Tennessee specific, or otherwise relevant to Tennessee. Any regional information provided is relevant to Tennessee. Any regional information is relevant to the extent it gives an indication of how the region is performing and, therefore, how performance in Tennessee should be viewed.



Ronald M. Pate

BELLSOUTH TELECOMMUNICATIONS, INC.  
REBUTTAL TESTIMONY OF DAVID P. SCOLLARD  
BEFORE THE TENNESSEE REGULATORY AUTHORITY

DOCKET NO. 01-00362

NOVEMBER 20, 2001

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH  
BELLSOUTH TELECOMMUNICATIONS, INC.

A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.  
My current position is Manager, Wholesale Billing at BellSouth Billing, Inc.  
("BBI"), a wholly owned subsidiary of BellSouth Telecommunications, Inc.  
("BellSouth"). In that role, I am responsible for overseeing the implementation  
of various changes to BellSouth's Customer Records Information System  
("CRIS") and Carrier Access Billing System ("CABS").

Q. ARE YOU THE SAME DAVID SCOLLARD THAT FILED DIRECT  
TESTIMONY IN THIS PROCEEDING?

A. Yes.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY IN THIS  
PROCEEDING?

1 A. The purpose of my testimony is to reply to the rebuttal testimony of  
2 AT&T/TCG witness Jay M. Bradbury in this proceeding pertaining to the  
3 regionality of the systems and processes BellSouth uses to bill CLECs for the  
4 services ordered from BellSouth.

5

6 Q. ON PAGE 18 OF HIS DIRECT TESTIMONY, MR. BRADBURY CLAIMS  
7 THAT THE SYSTEMS THAT PERFORM BILLING FUNCTIONS ARE  
8 NOT THE SAME THROUGHOUT BELL SOUTH'S NINE STATE REGION.  
9 PLEASE COMMENT ON THIS.

10

11 A. Mr. Bradbury is incorrect in his claim. The same physical software that  
12 processes transactions and creates invoices in Tennessee (i.e., CRIS, CABS  
13 and BIBS) also performs these same functions in all other states in the  
14 BellSouth region. The control functions used to manage the multitude of  
15 billing transactions are performed by the same group for all of the states in the  
16 BellSouth region, including Tennessee. Methods and procedures required to  
17 perform all of the steps to accurately produce bills and usage information for  
18 CLECs are developed by a central staff supporting all states. The maintenance  
19 of the various reference tables (such as product rates, etc.) used by the billing  
20 system is handled for all states by one group. The systems, processes, and  
21 procedures are the same for all states and are created, maintained and executed  
22 by the same group of employees regardless of the state being processed. To  
23 effectively manage the massive amounts of data processing required to keep  
24 the daily billing cycles running, customer accounts are segregated into separate  
25 sets of databases depending on the state in which that account resides. Because

1 of this, multiple occurrences of CRIS, BIBS, and CABS run in parallel at the  
2 same time utilizing all of these databases. However, all of the software  
3 versions of CRIS, CABS and BIBS are identical to each other, and they are run  
4 on the same type of hardware for all states. Regardless of which processing  
5 stream is running, the software, controls, procedures, and processing steps  
6 required to create invoices and usage records for customers (CLEC as well as  
7 retail) are the same. Therefore, it would redundant to again test these systems  
8 and processes in Tennessee.

9  
10 Q. DOES BELLSOUTH PROCESS BILLS IDENTICALLY FROM STATE TO  
11 STATE?

12  
13 A. Yes. First, let me state that BellSouth does use the same systems and processes  
14 to create bills regardless of the state being processed. As I described in my  
15 direct testimony, there are legal and regulatory differences in how services are  
16 priced and how taxes are applied, for example, that will necessarily cause the  
17 bills to be somewhat different. However, the systems and processes that  
18 support even these differences are the same. For example, in one state the  
19 pricing for a particular service may include a recurring charge as well as a non-  
20 recurring charge when a service is ordered while in a second state only the  
21 recurring charge is used. In this instance, the content of the bill may vary  
22 between the two states, but the process by which the rates for that product are  
23 placed on the customer's bill (whether or not the non-recurring charge is  
24 present) is the same. The BellSouth employees loading the rates for that  
25 product would either load the rates or not load the rates as specified by the



1 contract or tariff for the service in an identical manner using the same  
2 processes, documentation and databases. The staff that creates and maintains  
3 the manual processes used for billing create one set of guidelines to be used for  
4 all states. Similarly, the creation and maintenance of the computer software  
5 used in the billing system is done regionally. For example, the software that  
6 processes usage in Tennessee is also the same software that processes usage in  
7 Georgia. Therefore, while the information maintained by the processes may be  
8 different, the processes by which the information is loaded and the systems  
9 into which the information is loaded, are the same.

10  
11 Q. MR. BRADBURY, ALSO ON PAGE 18 OF HIS TESTIMONY, SUGGESTS  
12 THAT SINCE THE INPUTS TO THE BILLING SYSTEM ORIGINATE  
13 FROM A NUMBER OF SOURCES THROUGHOUT THE REGION, THE  
14 PERFORMANCE OF THE BILLING SYSTEM WILL NOT BE THE SAME  
15 FROM STATE TO STATE. IS THIS TRUE?

16  
17 A. No. What Mr. Bradbury describes are situations where a particular transaction  
18 may contain an error or other similar issue. These transactional differences  
19 would not be caused by differences in the procedures being used to originate  
20 them but rather from some problem that has appeared in those systems or  
21 procedures. These problems would not be more likely in Tennessee versus any  
22 other state. Actually, Mr. Bradbury's comments prove BellSouth's point. Since  
23 any given transaction may have an error present on it (whether originating  
24 from a switch or a service representative that is having a bad day) various edits  
25 and controls are in place to highlight that error and have it resolved. These

1 edits and controls are the same for all states. Therefore, the performance of the  
2 billing system (in terms of providing timely and accurate billing information)  
3 would be the same.

4

5 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

6

7 A. Yes.

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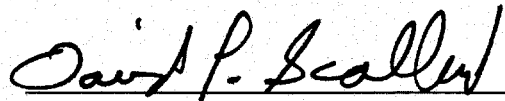
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AFFIDAVIT

STATE OF: Alabama  
COUNTY OF: Jefferson

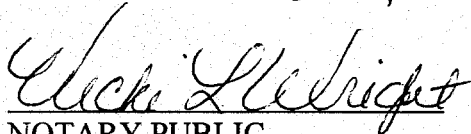
BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David P. Scollard –Manager- Wholesale Billing, BellSouth Billing Inc., who, being by me first duly sworn depose and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 5 pages and 0 exhibit(s).



David P. Scollard

Sworn to and subscribed  
before me on November 20, 2001



NOTARY PUBLIC

Notary Public, Cobb County, Georgia  
My Commission Expires June 19, 2005

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

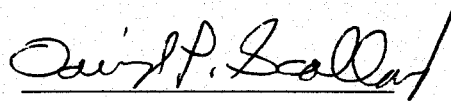
In re:

Docket to Determine the                   )  
Compliance of BellSouth                )  
Telecommunications, Inc.'s.              )  
Operations Support Systems with        )  
State and Federal Regulations          )

Docket No.: 01-00362

**AFFIDAVIT OF DAVID P. SCOLLARD**

I, David P. Scollard, hereby certify that my testimony filed in this docket is current, Tennessee specific, or otherwise relevant to Tennessee. Any regional information provided is relevant to Tennessee. Any regional information is relevant to the extent it gives an indication of how the region is performing and, therefore, how performance in Tennessee should be viewed.



David P. Scollard